



American Cyanamid Company
Agricultural Division
P.O. Box 817
Hannibal, MO 63401
(314) 769-2011

RECEIVED
SEP 25 1990
PRMT-SECTION

September 24, 1990
Federal Express 8317225405

Mr. David A. Wagoner, Director
Waste Management Division
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

RE: Request for Modification of RCRA Part B Permit MOD050226075

Dear Mr. Wagoner:

The purpose of this submittal is to formally request a modification of the RCRA Part B Permit MOD050226075 issued to American Cyanamid Company for the operation of the hazardous waste management facilities servicing Cyanamid's Hannibal, Missouri, manufacturing facilities. This request is made in response to changes made in the federal hazardous waste management regulations as published in the March 29, 1990, Federal Register (pages 11798 - 11877).

The referenced information contained in the Federal Register changes the previous definition of the "toxicity characteristic" hazardous waste category from wastes defined by the previous analytical procedure entitled Extraction Procedure (EP) to a new analytical procedure entitled Toxicity Characteristic Leaching Procedure (TCLP). As a result of the changes in the definition of Toxicity Characteristics category of hazardous wastes, there are several waste streams and waste management facilities at Cyanamid's Hannibal Plant that will now be included in the RCRA hazardous waste management program.

As a result of the new Toxicity Characteristics (TC) definition, four previously non-RCRA waste streams presently being managed in existing facilities at the Hannibal Plant may now be considered as RCRA hazardous wastes. As a result of this reclassification, we are requesting a modification of our present Part B Permit to include these waste streams in our presently RCRA-permitted waste management facilities and to include existing previously non-RCRA waste management facilities that are presently managing these waste streams which will now become a part of the RCRA program.

The change in the regulations will result in the reclassification of several of our existing facilities including



R00173997
RCRA RECORDS CENTER

A012



Mr. David A. Wagoner

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one incinerator, two waste storage tanks, and a container storage area from non-RCRA to RCRA waste management facilities. We have utilized the EPA RCRA Part A Application forms as a format to provide a description of the newly classified waste streams and additional waste management facilities that will be included in our modified RCRA Part B Permit. We have included a completed revised Part A Application as an addendum to this submittal to provide the required notification for a Part B modification in accordance with 40 CFR 270.42 and guidance provided in the March 29, 1990, Federal Register regarding the new Toxicity Characteristic regulations.

As a result of our review of the new Toxicity Characteristic regulations and after discussions with MDNR staff, we are somewhat unclear as to how the MDNR and EPA are going to coordinate the implementation of the new regulations. We are submitting our request for modification of our RCRA Part B to both your office and the Missouri Department of Natural Resources to inform both programs of the applicability of the regulations to our facilities. As we have worked together on the development of our present RCRA Part B Permit, we anticipate a continued joint effort on the development of the requested modifications. After you have had an opportunity to review the enclosed information, we would appreciate guidance on completing the modification procedures.

We look forward to working towards the successful completion of this project. If you have any questions with regard to this submittal or require any additional information, please contact me at 1-314-769-2011, Ext. 2268.

Sincerely,

AMERICAN CYANAMID COMPANY
Agricultural Division

A handwritten signature in black ink, appearing to read 'J. B. Willett', with a large, sweeping initial 'J'.

J. B. Willett, P.E.
Manager, Environmental Services

JBW/dep
enclosure

cc: Mr. John D. Doyle, P.E.
Chief, Hazardous Waste Management Section
Waste Management Program
Missouri Department of Natural Resources

Mr. Charles S. Decker, P.E.

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER																																																							
<div style="text-align: center; font-size: 2em; font-weight: bold;">EPA</div> <div style="text-align: center; font-weight: bold; margin-top: 20px;">PLEASE PLACE LABEL IN THIS SPACE</div>		GENERAL INSTRUCTIONS		F M O D 0 5 0 2 2 6 0 7 5																																																							
		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.		1 2 3 4 5 6 7 8 9 10 11 12 13 14 15																																																							
II. POLLUTANT CHARACTERISTICS		<div style="font-size: 0.8em; margin-bottom: 5px;">INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</div> <table border="1" style="width:100%; border-collapse: collapse;"><thead><tr><th rowspan="2" style="width: 40%;">SPECIFIC QUESTIONS</th><th colspan="3" style="text-align: center;">MARK 'X'</th><th rowspan="2" style="width: 40%;">SPECIFIC QUESTIONS</th><th colspan="3" style="text-align: center;">MARK 'X'</th></tr><tr><th style="width: 10%;">YES</th><th style="width: 10%;">NO</th><th style="width: 10%;">FORM ATTACHED</th><th style="width: 10%;">YES</th><th style="width: 10%;">NO</th><th style="width: 10%;">FORM ATTACHED</th></tr></thead><tbody><tr><td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td><td></td><td style="text-align: center;">X</td><td></td><td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td><td></td><td style="text-align: center;">X</td><td></td></tr><tr><td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td><td style="text-align: center;">X</td><td></td><td></td><td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td><td></td><td style="text-align: center;">X</td><td></td></tr><tr><td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td><td style="text-align: center;">X</td><td></td><td style="text-align: center;">X</td><td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td><td></td><td style="text-align: center;">X</td><td></td></tr><tr><td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td><td></td><td style="text-align: center;">X</td><td></td><td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td><td></td><td style="text-align: center;">X</td><td></td></tr><tr><td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td><td></td><td style="text-align: center;">X</td><td></td><td>J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td><td></td><td style="text-align: center;">X</td><td></td></tr></tbody></table>				SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'			YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED	A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. 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VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	2	8	7	9	(specify) Pesticide Manufacturing	7	2	8	3	3	(specify) Pharmaceutical Manufacturing								
C. THIRD										D. FOURTH									
7	2	0	4	8	(specify) Phosphate Animal Feed	7					(specify)								

VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?									
8	A	m	e	r	i	c	a	n		C	y	a	n	a	m	i	d		C	o	m	p	a	n	y	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO													
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)																			
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)										A 3 1 4 7 6 9 2 0 1 1									
E. STREET OR P.O. BOX																																							
P O Box 817																																							
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND									
B Hannibal																				M O					6 3 4 0 1					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																	
9	N		M	0	0	0	0	1	7	1	6	9	P																			
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																	
9	U														9																	(specify)
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																	
9	R		M	0	D	0	5	0	2	2	6	0	7	5	9																	(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. Map included in Original Part A Application

XII. NATURE OF BUSINESS (provide a brief description)

Agricultural chemical manufacturing facility--pesticides, pharmaceuticals, animal feed supplements.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
D. E. Warren, Plant Manager																														9/24/90									

COMMENTS FOR OFFICIAL USE ONLY

COMMENTS FOR OFFICIAL USE ONLY																													

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S 0 2	600	G						
X-2	T 0 3	20	E						
11	T 0 3	3,165	E						

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS..... P
TONS..... T

METRIC UNIT OF MEASURE CODE
KILOGRAMS..... K
METRIC TONS..... M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NUMBER	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W M O D O 5 0 2 2 6 0 7 5 1													W DUP 2 DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																						
				1. PROCESS CODES (enter)																						
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																						
1	P 0 9 4	1	T	S 0 1	S 0 2	T 0 3																				
2	K 0 3 8	8600	T	S 0 2	T 0 3																					
3	K 0 3 9	5	T	S 0 1	T 0 3																					
4	D 0 0 3	10	T	S 0 1	T 0 3																					
5	F 0 0 2	5	T	S 0 1	S 0 2	T 0 3																				
6	F 0 0 3	5	T	S 0 2	T 0 3																					
7	F 0 0 5	900	T	S 0 2	T 0 3																					
8	U 1 6 1	5	T	S 0 2	T 0 3																					
9	U 2 2 0	1	T	S 0 2	T 0 3																					
10	D 0 0 3	22500	T	S 0 2	T 0 3																					
11	D 0 0 1	1750	T	S 0 2	T 0 3																					
12	D 0 0 7	500	T	S 0 1																						
13	D 0 2 1	750	T	S 0 1	S 0 2	T 0 3																				
14	D 0 2 8	226,500	T	S 0 1	S 0 2	T 0 1	T 0 3																			
15	D 0 4 3	7,000	T	S 0 1	S 0 2	T 0 3																				
16																										
17																										
18																										
19																										
20																										
21																										
22																										
23																										
24																										
25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

Not Applicable

EPA I.D. NO. (enter from page 1)

S	F	M	0	D	0	5	0	2	2	6	0	7	5	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

3	9	5	1	1	0
65	66	67	68	69	71

LONGITUDE (degrees, minutes, & seconds)

9	1	2	5	4	5
72	74	75	76	77	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

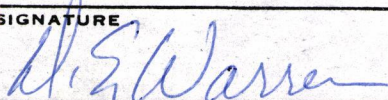
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

D. E. Warren, Plant Manager

B. SIGNATURE



C. DATE SIGNED

9/24/90

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

D. E. Warren, Plant Manager

B. SIGNATURE



C. DATE SIGNED

9/24/90

V. FACILITY DRAWING (see page 4)

Please refer to attached drawing.
Figure III - 3 - Hannibal Facilities Plant Layout.

